

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

DDR HOLDINGS, LLC,

Plaintiff and Counterdefendant,

vs.

HOTELS.COM, L.P., EXPEDIA, INC.;  
TRAVELOCITY.COM, L.P.;  
SITE59.COM, LLC;  
INTERNETWORK PUBLISHING  
CORPORATION d/b/a LODGING.COM;  
NEAT GROUP CORPORATION;  
ORBITZ WORLDWIDE, LLC;  
INTERNATIONAL CRUISE &  
EXCURSION GALLERY, INC.;  
OURVACATIONSTORE.COM, INC.;  
NATIONAL LEISURE GROUP, INC.;  
WORLD TRAVEL HOLDINGS, INC.;  
and DIGITAL RIVER, INC.,

Defendants and Counterclaimants.

CIVIL ACTION NO. 2-06-CV—42 (RG)

**JURY TRIAL DEMANDED**

**STIPULATED MOTION FOR DISMISSAL WITH PREJUDICE**

The plaintiff DDR Holdings LLC, on the one hand, and defendants International Cruise & Excursion Gallery, Inc. (“ICE”) and OurVacation Store.com, Inc. (“OVS”) (“the Named Defendants”), on the other hand, pursuant to Fed. R. Civ. P. 41(a)(2) and (c), hereby move for an order dismissing all claims and counterclaims in this action WITH PREJUDICE, only to the extent that they relate to the Named Defendants, with each party to bear their own costs, expenses, and attorneys’ fees.

Respectfully submitted,

/s/ Ophelia F. Camina

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ATTORNEYS FOR PLAINTIFF  
DDR HOLDINGS, LLC

**CERTIFICATE OF SERVICE**

I certify that this document was filed electronically pursuant to Local Rule CV-5(a) on January \_\_\_, 2013. Pursuant to Local Rule CV-5(a)(3)(A), this electronic filing acts to electronically serve all counsel who have consented to electronic service via the Court's CM/ECF system and in addition has been served electronically pursuant to the Electronic Service Agreement.

/s/ Ophelia F. Camina